

Introduction

The following memorandum of understanding (MOU) has been developed to document the interfaces between the Advanced Mixed Waste Treatment project (British Nuclear Fuels Limited), the U.S. Department of Energy, and the MOU Contractor at the Idaho National Engineering and Environmental Laboratory. This MOU shall be updated immediately following the INL and ICP contract awards in FY2005 to reflect changes in roles and responsibilities resulting from the split of the INEEL contract into the INL contract and the ICP contract.

ADVANCED MIXED WASTE TREATMENT PROJECT TRI-PARTY MEMORANDUM OF AGREEMENT

for

BNFL Inc.

Department of Energy

and

Bechtel BWXT Idaho, LLC



**United States Department of Energy
Idaho Operations Office**

ADVANCED MIXED WASTE TREATMENT PROJECT
TRI-PARTY MEMORANDUM of AGREEMENT

for

BNFL, Inc.

Department of Energy

Bechtel BWXT Idaho, LLC

SIGNATURE PAGE

Effective Date:

With the common goal of meeting all of the transuranic waste-related milestones in the Settlement Agreement with the State of Idaho, the undersigned authorities, by their signatures below, acknowledge and accept their organizations' roles and responsibilities as identified in this Memorandum of Agreement (MOA). This MOA remains in effect until it is superseded by a new document. If this MOA modification conflicts with existing DOE-ID contracts (DE-AC07-99ID13727 or DE-AC07-97ID13481), with Bechtel BWXT Idaho, LLC, or BNFL, Inc., the forgoing contracts take precedence to the extent of any conflict.

Approved by:

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<hr/> B. G. Edgerton DOE-ID, Director AMWTP	<hr/> Date
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ACRONYMS

AMWTP	Advanced Mixed Waste Treatment Project
CAMS	Constant Air Monitoring System
CFA	Central Facilities Area
CFR	Code of Federal Regulations
BBWI	Bechtel BWXT Idaho, LLC
DEQ	State of Idaho Department of Environmental Quality
DOE	U.S. Department of Energy
DOE-ID	U.S. Department of Energy, Idaho Operations Office
EDF	Engineering Design File
ENS	Emergency Notification System
EPCRA	Emergency Planning and Community Right-to-Know Act
EOC	Emergency Operations Center
ER	Environmental Restoration
ES&H	Environment, Safety & Health
ESHPOP	Environment, Safety & Health Program Operating Plan
FFCA	Federal Facilities Compliance Act
GFE	Government-Furnished Equipment
GFP	Government-Furnished Property
HAZMAT	hazardous materials
HAZWOPER	hazardous waste operator
HEPA	high-efficiency particulate air
HVAC	heating, ventilation, and air conditioning
HWMA	Hazardous Waste Management Act
ICMS	INEEL Chemical Management System
IDAPA	Idaho Administrative Procedures Act
ILTSF	Intermediate Level Transuranic Storage Facility
IMWI	Idaho Mixed Waste Information (System)
INEEL	Idaho National Engineering and Environmental Laboratory
IWTS	Integrated Waste Tracking System
LSS	life safety systems
kV	kilovolt
kW	kilowatt
M&O	management and Operating

MOA	Memorandum of Agreement
MVA	megavolt amperes
NESHAP	National Emission Standards for Hazardous Air Pollutants
OSHA	Occupational Safety and Health Administration (Act)
PMR	Permit Modification Request
PTC	Permit to Construct
RAMS	Remote Area Monitor System
RCRA	Resource Conservation and Recovery Act
RPP	Radiation Protection Program
RTR	real-time radiography
RWMC	Radioactive Waste Management Complex
SAR	Safety Analysis Report
SPCC	Spill Prevention Control and Countermeasures
STP	Site Treatment Plan
SWEPP	Stored Waste Examination Pilot Plant
TRU	transuranic
TRUPACT	Transuranic Package Transporter
TSA	Transuranic Storage Area
TSA-RE	Transuranic Storage Area-Retrieval Enclosure
USQ	Unreviewed Safety Question
WAC	Waste Acceptance Criteria
WCC	Warning Communications Center
WGS	Waste Generator Services
WIPP	Waste Isolation Pilot Plant
WMF	Waste Management Facility
WSFs	Waste Storage Facilities

INTRODUCTION

Scope

This document is the third revision of the Memorandum of Agreement (MOA) for the Advanced Mixed Waste Treatment Project (AMWTP). It completely replaces earlier versions of the MOA and incorporates all outstanding changes to those earlier versions. The MOA is a tri-party agreement between BNFL, Inc. (BNFL), the Department of Energy Idaho Operations Office (DOE-ID), and the current Idaho National Engineering and Environmental Laboratory (INEEL)/Idaho Completion Project Management and Operating (M&O) contractor, Bechtel BWXT Idaho, LLC (BBWI). The AMWTP contract is a prime DOE-ID contract (DE-AC07-97ID13481) with BNFL Inc. This revision (rev 3) is issued in order to incorporate new interfaces as they relate to the retrieval operations of the AMWTP.

AMWTP Background

DOE-ID awarded the AMWTP contract to BNFL on December 20, 1996. The AMWTP is an important part of BBWI's plan for long-term management and disposition of stored transuranic (TRU)-contaminated waste. The AMWTP will retrieve and treat approximately 65,000 cubic meters of TRU and alpha mixed low-level waste (ALLW) currently stored aboveground at the Radioactive Waste Management Complex (RWMC). Treating the waste also meets several of the milestones established in the Settlement Agreement on Spent Nuclear Fuel (the Settlement Agreement) agreed to by the U.S. Department of Energy, the State of Idaho, and the U.S. Navy in addition to meeting requirements in the Federal Facilities Compliance Act (FFCA) Site Treatment Plan. DOE-ID has the contract option to have the AMWTP treat additional DOE waste streams. As these additional waste streams are identified, it is envisioned that interim changes will be made to the MOA.

Purpose of the AMWTP MOA

The purpose of the AMWTP MOA is to identify interfaces between BNFL, DOE-ID, and BBWI, and to acknowledge each party's responsibilities to work toward successful completion of the AMWTP. The AMWTP MOA is also intended to promote effective communication and a cooperative working relationship between the three parties, while enabling each to fulfill its respective legal and contractual obligations.

Modifications to the MOA

Whenever the AMWTP MOA is revised, the existing version of the MOA will be reevaluated as needed to confirm that earlier agreed-upon interface responsibilities are adequate for the AMWTP activities addressed in the current version of the MOA.

Between planned revisions, the adequacy of the AMWTP MOA will be periodically reviewed by all three parties. At any time, at the request of any of the three parties, ad hoc modification to the AMWTP MOA can be proposed, and will be considered by the other parties. Upon agreement by all of the authorized signatories, the AMWTP MOA can be modified to accommodate changed or unforeseen circumstances. All modifications to the MOA must be approved and signed by the authorized representatives of all three MOA parties. Ad hoc modifications are issued as changes to the current version of the MOA. The MOA in effect at any time is the current approved version with all outstanding changes to that version.

For document control purposes, the MOA is issued as a DOE-ID controlled document.

AMWTP MOA Approval Authority

The AMWTP MOA must be approved by the three responsible parties, BNFL, DOE-ID, and BBWI.

Funding Issues

This AMWTP MOA does not modify approved work scopes, provide funding for the activities described, or in any way replace BNFL's or BBWI's contract requirements with DOE-ID. The AMWTP MOA is a mechanism for BBWI to identify the work required to support the interface activities and to obtain funding for that work. By signing this AMWTP MOA, BBWI acknowledges the need for the interface activities and further agrees to pursue funding as necessary from the appropriate DOE or BNFL funding sources to accomplish the specified work scope. If the work scope is approved and funded on the requested schedule, and any agreed upon cooperation by BNFL and/or DOE-ID is provided, BBWI accepts responsibility to complete the identified interface activities and Responsibility Statements in accordance with BBWI's contract. The Responsibility Statements in each section of the MOA are intended to be a concise list of some of the interface activities that will be performed by each of the parties. The Responsibility Statements are not a complete list of all MOA activities to be performed by each of the parties. Other activities are identified elsewhere within the MOA.

DOE-ID's approval of the AMWTP MOA indicates their commitment to completing the required activities outlined within this document. DOE-ID will work with associated DOE programs to ensure AMWTP MOA activities are given the necessary priority and funding. DOE-ID has provided the following guidelines for funding BBWI activities relating to the AMWTP:

- Activities that support DOE-ID's AMWTP staff or directly support BNFL designs, permits, and plans will be funded by BBWI's AMWTP Technical Support control account. If funding is unavailable, joint discussions between DOE-ID and BBWI will resolve the issues.
- Activities that prepare the INEEL for AMWTP operation and are not BNFL contract requirements will be funded by normal direct or indirect funding sources. If funding is unavailable, joint discussions between DOE-ID and BBWI will resolve the issues. These activities will be charged in a manner that enables DOE-ID to identify the extent of BBWI support provided to the AMWTP.
- Services identified in the AMWTP contract will be charged to BNFL at the specified contract rate, and DOE-ID will fund the overage or recover the underage of BBWI's actual costs.
- Other services requested and paid for by BNFL that are provided by BBWI to BNFL will be charged to BNFL consistent with BBWI's disclosed accounting practices.

The AMWTP contract between DOE-ID and BNFL specifies the unit price for mandatory and certain elective services. In the manner directed by the DOE-ID Contracting Officer, BNFL will be invoiced for these mandatory and selected elective services at the rates specified in the contract. Other requested services purchased by BNFL not specified in the AMWTP contract will be charged consistent with BBWI's disclosed accounting practices, which are identified in the "Cost Accounting Standards Board Disclosure Statement" provided periodically to DOE-ID.

Issue Resolution

If disputes arise regarding the interpretation or implementation of this AMWTP MOA, they will be resolved at the first opportunity and at the lowest possible level. If disputes cannot be resolved in this manner to the satisfaction of all three parties within five working days, or such later date that all three parties agree to, they can be submitted by any one party to an AMWTP MOA Dispute Resolution

Committee. This committee consists of the DOE-ID Assistant Manager for the Office of Environmental Management, the BBWI Vice President for the Idaho Completion Project, and the BNFL AMWTP General Manager. This committee will address the dispute within five working days of it being brought to their attention. Decisions by this committee will be implemented with a change to the AMWTP MOA, as described in the above Modifications paragraphs.

1. GOVERNMENT-FURNISHED PROPERTY AND EQUIPMENT

1.1 Brief Description of Interface

The AMWTP contract offers several facilities to BNFL for use as government-furnished property. This offer includes the personal property (e.g., equipment) and related personal equipment (e.g., integral equipment systems) contained in the identified buildings for the duration of the AMWTP contract. All of the preceding types of government-furnished property may be referred to collectively as “government-furnished property” (GFP). GFP and equipment identified for change of custody is identified in this MOA and has been removed from Appendix C, Section J, of the AMWTP contract.

The AMWTP controls everything within the Transuranic Storage Area (except WMF-628 and the Intermediate Level Transuranic Storage Facility [ILTSF]) and WMF-613 in the RWMC Administrative Area. The AMWTP boundaries are defined by the Transuranic Storage Area (TSA) chain-link fence to the north, east, and south, with the exception of WMF-628, which will remain in BBWI’s control. The AMWTP boundary to the west is a north/south line adjacent and parallel to the west edge of the blacktop road west of WMF-636 and East of the ILTSF. The skin of WMF-613 is the boundary of the AMWTP’s office building located in the RWMC Administrative Area. BNFL will be allowed access to the exterior of WMF-613 for maintenance purposes. The skin of WMF-628 is the boundary of BBWI’s Type II storage building located in the TSA. BBWI will be allowed access to the exterior of WMF-628 for inspections, maintenance, and security purposes. BBWI personnel and equipment will be allowed entry into the AMWTP through the north TSA gate (south RWMC gate) and the use of AMWTP roadways to access WMF-628 and the ILTSF to conduct operations in those facilities.

1.2 Government-Furnished Property Acceptance and Change of Custody

BNFL’s acceptance of custody and control over GFP will occur through an inspection and acceptance change-of-custody activity at the time of transfer. BNFL assumes full responsibility for all GFP and supporting documentation and records transferred to them. BBWI is relieved of all responsibility and liability upon such transfer, except for regulatory requirements or as directed by the DOE in turnover documentation. The parties will perform the inspection jointly. Inspection will include reviewing maintenance and property upkeep records and testing to determine the operational status of the equipment at the time of custody change. Turnover of equipment will include turnover of existing operating, calibration, and maintenance logs and records; technical manuals; applicable drawings; and any notes, memoranda, or other documents that describe the proper or improper functioning of the equipment. At the time of custody change, BNFL will assume responsibility for all GFP maintenance, configuration control of property and records, and eventual Resource Conservation and Recovery Act (RCRA) closure and decontamination and decommission (D&D) of the GFP, as applicable by contract. It is recognized that smooth and efficient transfer of GFP requires prior planning on the part of all three MOA parties.

Verification that the land within the construction boundaries and that the GFP identified in this section of the MOA as previously transferred are suitable for BNFL to take custody of has been performed in accordance with the Site Verification Plans developed by BBWI. BNFL will have the opportunity to provide comments on additional plans necessary for the remaining GFP turnover activities. Each plan will be approved by DOE-ID, and each will incorporate the requirements in 10 CFR 835, Appendix D, and the *INEEL Radiological Control Manual*. Site Verification Plans for the remaining building transfers will include BBWI-performed radiological surveys of buildings and equipment. Based on the results of historical site assessments, scoping studies, and the results of these radiation surveys, DOE-ID will determine the need for sampling and analysis for hazardous constituents. BNFL may

observe the surveys and review the sampling data. BBWI will prepare a final report of each completed survey and will submit it to DOE-ID and BNFL for review and acceptance before the planned date for change of custody. This report will be included in the GFP turnover documentation package.

A three-party transfer form has been developed and is being used to document the transfer and change of custody of real property, personal property, and TRU-contaminated waste. The Department of Energy Acquisition Regulation (DEAR) Transfer Inventory Schedule (RE: DEAR 970.5204.21) is the form. Attachments to this schedule may be used by either party to describe the status of the property, buildings, or TRU-contaminated waste at turnover. DEAR form attachments may also be used to document the records, drawings, and documents turned over at the time of transfer. The change of property custody will be governed by 41 DEAR 970.5204-21, Property Requirements. Before custody change, GFP will be adequately identified on the Transfer Inventory Schedule. Appropriate and existing machinery history, preventive maintenance records, and current drawings will be made available to BNFL for review before GFP acceptance. BNFL will use DOE-ID-approved property records system/disposal protocol. As an alternative to developing their own system, BNFL may continue to purchase these services from BBWI through the use of the existing Memorandum Purchase Order between BNFL and BBWI.

The purpose of this section of the MOA is to identify the major items of GFP that have been transferred to the AMWTP. This list is provided for turnover and future operations planning for the three parties; it is not intended to be exhaustive. Government assets that are not specified in this MOA but are to be transferred from BBWI to BNFL must be processed according to the approved INEEL system.

1.3 Administrative Office Space

Building WMF-613, within the RWMC Administrative Area at the RWMC site, was made available to BNFL by BBWI on December 31, 2002. BBWI will be allowed access to the fire riser room and communications room, via the AMWTP Shift Team Lead.

1.4 Utility Interfaces

The Utility interfaces for each government-furnished building are described below. All drawing numbers and revisions identified in this MOA should be verified with the applicable document control organization before use. Drawings, and the systems described therein, may have been revised from those listed in this MOA. BNFL will maintain all utilities, lines and equipment on the AMWTP side of the interface, and BBWI will maintain all utilities, lines and equipment on the BBWI side of the interface. Changes to the interface points described in the MOA must be agreed to by all three parties.

1.4.1 TSA-RE (WMF-636) and Support Equipment

The utility interfaces for WMF-636 are listed below. They can be found on the associated INEEL drawing.

<u>Utility/System</u>	<u>Drawing No.</u>
Electrical	448996, Rev 12
Emergency Notification	449776
Fire Alarm	449752
Fire Water	175609, Rev 15
Potable Water	Valve Number PW-SHV-SA01

During testing and operations, the average electrical power demand for WMF-636 will be 99 kVa; the peak will be 113 kVa.

1.4.2 WMF-610 SWEPP Building

The utility interfaces for WMF-610 are listed below. They can be found on the associated INEEL drawing.

Utility/System	Drawing No.
Electrical	See Section 2
Fire Water	175609, Rev15
Potable Water	Valve Number PW-SHV-SA02
Sanitary Sewer	426359, Rev7, Sheets 1 and 3

1.4.3 WMF-635/615 Type I Storage Module

The utility interfaces for WMF-635/615 are listed below. They can be found on the associated INEEL drawing.

Utility/System	Drawing No.
Electrical, WMF-635	See Section 2
Electrical, WMF-615	See Section 2
Fire Water	175609, Rev15

1.4.4 WMF-629 through 634 Type II Storage Modules

With the exception of WMF-628, which will remain under BBWI's control, the custody and control of the Type II storage modules WMF-629 through WMF-634 were transferred to BNFL.

The utility interfaces for the Type II storage modules are listed below. They can be found on the associated INEEL drawing.

1.4.5 WMF-629 through 633

Utility/System	Drawing No.
Electrical	See Section 2
Fire Water	175609, Rev15

1.4.6 WMF-634

Utility/System	Drawing No.
Electrical	448996, Rev12/175607
Emergency Notification	449819, Rev1
Fire Alarm	449807, Rev2

1.4.7 WMF-618 TRUPACT Loading Facility

The utility interfaces for WMF-618 are listed below. They can be found on the associated INEEL drawing.

Utility/System	Drawing No.
Electrical	See Section 2
Fire Water	175609, Rev15

1.4.8 WMF-617 SWEPP Maintenance Shop

The utility interfaces for WMF-617 are listed below. They can be found on the associated INEEL drawing.

Utility/System	Drawing No.
Electrical	See Section 2
Fire Water	175609, Rev15
Potable Water	Valve Number PW-SHV-1701

1.4.9 WMF-711 Air Support Building II

WMF-711 will also be transferred to BNFL and is planned to be transferred during the second quarter of FY-2003. WMF-711 is an air support weather enclosure that has been deflated and the roof fabric removed. Most of what remains are the concrete perimeter blocks and the ventilation/inflation unit.

1.4.10 WMF-628 and The ILTSF

The Type-II storage facility, WMF-628, and the Intermediate Level Transuranic Storage Facility (ILTSF) are located within the TSA and will remain under the control of BBWI. For the existing utilities, BBWI will be allowed access for repairs, maintenance and modifications.

1.5 Responsibility Statements

BNFL will:

- Notify BBWI of any issues that cause or have the potential to cause a safety noncompliance on the part of BBWI.
- Provide DOE-ID with Unreviewed Safety Questions (USQ) or draft changes to affected safety authorization basis documents.
- Cooperate with the BBWI to allow routine access of BBWI equipment and personnel to WMF-628, the ILTSF, and the BBWI portion of utility and service systems within the TSA, for operations, maintenance, and security purposes. This includes use of BNFL-controlled roadways and access points.
- Cooperate with BBWI during any site wide emergency to ensure employee safety.

- Notify the INEEL Fire Department when a change of custody of GFP occurs.

DOE-ID will:

- Seek continued funding of programs necessary to maintain the condition of property and equipment.
- Monitor all activities at the RWMC through surveillance and conduct operation and maintenance assessments.
- Provide BBWI with the status of BNFL's early retrieval plans.
- Provide BBWI and BNFL with Unreviewed Safety Questions (USQ) or draft changes to affected safety authorization basis documents that could result in an RWMC or BNFL USQ.
- Provide updates to BNFL on environmental restoration activities within the RWMC that may affect BNFL AMWTP activities.

BBWI will:

- Provide DOE-ID with Unreviewed Safety Questions (USQ) or draft changes to affected safety authorization basis documents. As requested by DOE-ID, review the BNFL designs to determine if there is a change to the RWMC Safety Basis using the USQ process.
- Notify BNFL of any issues that cause or have the potential to cause a safety noncompliance on the part of the AMWTP.
- Cooperate with BNFL to allow access of AMWTP personnel to the WMF-613 office building, the DOE-ID offices in WMF-658, and the RWMC shift supervisor's desk in WMF-620.
- Cooperate with BNFL during any site wide emergency to ensure employee safety.
- Notify the INEEL Fire Department when a change of custody of GFP occurs.

2. UTILITIES AND SERVICES

2.1 Brief Description of Interface

BNFL will require connections to existing RWMC utility services, including electrical, alarm, and communication systems. Interfaces are being established to ensure that utility capacities are adequate for AMWTP operational needs; that existing utility systems are usable for the purpose intended, and that impacts on the RWMC utility systems are minimized. The as-built drawings referenced in this section are available from the BBWI document control system. Unless specified differently in this MOA, BNFL will maintain all lines and equipment on the AMWTP side of the connection to RWMC utilities. Utility interfaces for major facilities to be transferred are identified in Section 1.4. Other INEEL services, such as landfill, borrow pit, road, and ground maintenance, also require interfaces with AMWTP during operation.

BNFL will provide all equipment required for utility connections not currently installed. Details for the tie-in connection will be developed by BNFL and shown on a construction drawing. BBWI will be given the opportunity to review and approve the connection detail and installation procedure before tie-in. BBWI and BNFL will provide lockout/tagout measures as required for their system during the BNFL tie-in activity. As-built drawings will be provided by BNFL for all utility connections within 45 days of completing the connection.

Some AMWTP activities required for utility interfaces will be performed by BNFL within the RWMC boundary but outside of the AMWTP boundary. Those activities will be performed in full compliance with BBWI's operating procedures and Health and Safety requirements. On receipt of the requested outage schedule from BNFL, BBWI will provide documentation of the required procedures and requirements.

2.2 Electrical

2.2.1 Retrieval Operations

BNFL has connected to the existing 12.5-kilovolt (kV) RWMC distribution system for power at existing fused disconnect switch N-STRM-SAD1 (JP-8) and at a location between the fused disconnect switch N-STRM-SAE1 (JP-9) and transformer N-XFR-SAE1. BNFL has also connected to the existing single-phase 7.2 kV pole line ending at building WMF-652. The maximum anticipated connected load at each point is as follows: 1,500 kilovolt-ampere (kVA) on the 12.5-kV system and 75 kVA on the 7.2-kV system. BNFL will maintain a power factor for their total load placed on the INEEL power system of 0.90 or greater. Each connection point is separately metered with meters specified by BBWI. BBWI is also installing a new, metered, 12.5-kV service to PM-JP6.

2.2.2 Treatment Facility Operations

BNFL connected to the 138-kV power line running north of RWMC, as indicated on the attached AMWTP drawing 54-0131-Rev 1 (Appendix B), and constructed a new overhead 138-kV line east of the RWMC site to the southeast corner of the TSA. Power delivered to this substation is metered. This new overhead line connects to a new electrical substation in the southeast corner of TSA. BNFL distributes power underground from the new electrical substation to the AMWTP facility. The maximum anticipated

connected load during operation is 5000 kVA. The power factor will be 0.95 or higher for the load connected at the INEEL power system.

2.2.2.1 Electrical Interface Summary

BNFL has custody of the electrical distribution system, as follows:

- The 480-VAC power interfaces are designated as the load sides of the following transformers for their respective buildings:

WMF-610	Transformer 5-577	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-613	Transformer 5-634	See drawing no. 442635, Sheet 3, Rev. 8
WMF 615	Transformer 5-577	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-617	Transformer 5-577	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-618	Transformer 5-500	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-629	Main breaker inside WMF 629 (The facility receives its power from WMF 628)	
WMF-630	Transformer 6-039	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-631	Transformer 6-039	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-632	Transformer 6-038	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-633	Transformer 6-038	See drawing no. 442635, Sheet 4, Rev. 8.
WMF-635	Transformer 6-084	See drawing no. 442635, Sheet 3, Rev. 8.
WMF-711	Transformer 6-527	See drawing no. 442635, Sheet 4, Rev. 8.
- All equipment from fused cutout on pole 42-149-6 downstream. (Drawing 418372, Sheet 2 of 5)
- All equipment from fused cutout on pole 42-149-4A downstream. (Drawing 442635, Sheet 3,4 of 6)
- All equipment on the load side of XFR-SAG1 (6-062) and XFR-SAG2 (6-061) (WMF-636). (Drawing 448996)
- All equipment from the 138-kV line side of disconnect switch DS-805-001 downstream and the line side of 108-kV lightning arrestors. (AMWTF Substation) (Drawing 517814, Sheet 9)

2.3 Potable Water

BNFL has connected to the RWMC potable water system. The estimated maximum load for the AMWTP is 100 gallons per minute, or 8,000 gallons per day.

2.4 Sanitary Sewer

With the exception of WMF-636 and the AMWTP Treatment Facility, the interface point for all sanitary sewer/wastewater within the TSA is at the discharge of grinder pumps WH-GRDP-SA01 and WH-GRDP-SA02 (see drawing 426359, sheet 3). The interface point for WMF-636 is valve WH-SHV-SA01. For the AMWTP Treatment Facility, the AMWTP directs all sewage flows to a BNFL-supplied and installed grinder pump. Discharge from the grinder pump is into the existing pressurized sewer pipe adjacent to the west side of WMF-634, which goes to an existing lagoon. Maximum AMWTP sewage flows during the operational period are estimated to be 8,000 gallons per day and are to include only

domestic sewage. As defined in BBWI's Management Control Procedure-3480, domestic sewage is sanitary waste from basic sanitation activities associated with personnel and office/administrative areas, such as urinals/toilets, rest room and lunch room sinks, shower rooms, and janitorial sinks not in process areas.

2.5 Telecommunications/Data

BNFL will transfer the telecommunications interface point from the telephone pedestal located south of the RWMC fence line by the construction subcontractor area to RWMC junction point five. After placing 25 twisted copper pair telephone lines in service through JP-5, BNFL will return the lines currently used by AMWTP to BBWI in the following sequence: 38 lines after notification is received from BNFL that the new system downstream of JP-5 is installed and operable, and 7 lines following completion of the AMWTP construction activities. BNFL will provide all equipment and ensure that the equipment is compatible with existing RWMC equipment. BNFL will coordinate this installation with the INEEL M&O telecommunications department. BNFL will be responsible for maintaining all of their installed equipment.

As an interim measure to support immediate occupation of WMF-613 by BNFL, BBWI will activate a connection for 27 analog telephone lines with local and long distance service. 27 handsets will also be provided for those lines. Billing for use will be in accordance with previous established telecom practices. BBWI will also utilize available fiber running from JP5 to WMF-613 via WMF-619 to provide isolated data network capability. BNFL will connect to the fiber within WMF-635. BBWI personnel will make a junction within WMF-619 to WMF-613 providing a separate path for BNFL personnel within WMF-613 to access the AMWTP data network. BNFL will provide a network switch to be installed within WMF-613 for termination of the fiber connection.

A permanent solution to provide a pathway for BNFL to pull and terminate their telephone and data (copper and fiber) lines will inactivate the interim solution identified above.

2.6 Services

2.6.1 Landfill and Waste Disposal

The AMWTP contract offers landfill services for the AMWTP. BBWI has provided the necessary dumpsters at the AMWTP site and will service the dumpsters weekly. More frequent service is available, if required. As BNFL requirements change, it will forecast the number of dumpsters required and separate waste materials into wood, metal, paper/cardboard, and debris dumpsters. Bulk disposal service will be handled directly by BNFL during normal landfill operating hours, which is between 7:00 a.m. and 4:30 p.m., Monday through Thursday. BNFL will obtain and maintain an INEEL landfill complex user's permit.

2.6.2 Roads and Grounds Maintenance

Outside the AMWTP boundary, BBWI will provide road maintenance, grading, and snow removal. BBWI will also maintain the grounds and provide snow removal within the ILTSF. BNFL will maintain roads and grounds, including snow removal, within the AMWTP TSA boundaries, including up to WMF-628.

2.6.3 Soil and Debris Disposition

The T-12 Pit north of the RWMC has been designated for placement of clean soil from the TSA-RE (WMF-636). Other placement pits may be agreed to mutually between BBWI and BNFL.

2.6.4 Schedule for Utility Connections

BNFL will provide the schedule for remaining utility connections to BBWI in sufficient time for them to review the proposed connection plan. Each connection will require BNFL to prepare an Outage Request. Detailed coordination of these connections will be accomplished with the RWMC outage coordinator and the RWMC shift supervisor's office. Utility service relocations and connections required to support operations of the AMWTP Facility will be performed as needed. All AMWTP utility connections will be coordinated with the other RWMC utility users to plan for and minimize the impact of the outage.

2.7 Responsibility Statements

BNFL will:

- Maintain an electrical power factor greater than 0.95 during operations.
- Provide BBWI as-built drawings for all utility connections within 45 days of completing the connection.
- Meter all electrical power supplied to AMWTP, including power supplied to WMF-613, located in the RWMC Administrative Area.
- Request power outages 2 weeks before performing power tap changes required for temporary power and 6 weeks before power tap changes on the 138-kV power line.
- Comply with RWMC operations staff directions regarding the limitations of the deep well recovery during use of the RWMC water system.
- Provide the necessary engineering drawings and procedures for utility connections to BBWI.
- Provide updated detailed utility connection information and schedules to DOE-ID and BBWI.
- Comply with DOE-ID-10381, *INEEL Reusable Property, Recyclable Materials, and Waste Acceptance Criteria*, for disposal of industrial waste in the INEEL landfill.
- Resolve any operational, maintenance or compliance issues associated with BNFL discharge to the sewage system or use of the INEEL landfill.
- Maintain roads and grounds, including snow removal, within the AMWTP TSA boundaries, including up to WMF-628.

DOE-ID will:

- Review and approve BBWI's proposed disposition location for excavated soil and any requirements for surveying or sampling the excavated soil during disposition.

BBWI will:

- Continue to provide and maintain the utilities to the RWMC site and the TSA within the RWMC site, including electrical, potable water, firewater, communications, and sanitary sewer.
- Coordinate with BNFL and other RWMC utility users on the scheduling of utility and electrical power outages required for equipment installation, maintenance, and testing.
- Process outage requests within 10 working days of receipt of a request.

- Complete INEEL Form 435.27 log entries for BNFL industrial waste delivered to the INEEL landfill by BBWI personnel. Completion of this form does not constitute certification of BNFL's industrial waste.
- Provide BNFL an opportunity to comment on proposed changes to DOE-ID-10381, *INEEL Reusable Property, Recyclable Materials, and Waste Acceptance Criteria* that could affect AMWTP activities.
- Provide BNFL with clean soil placement in Pit-12, north of the RWMC, or other pits as agreed upon.
- Provide road and grounds maintenance, including snow removal, in the RWMC Administrative and Operations areas, including maintaining sidewalks and providing snow removal for WMF-613. BBWI will also maintain the grounds and provide snow removal within the ILTSF.

3. ENVIRONMENTAL

3.1 Brief Description of Interface

This section of the MOA is intended to promote effective environmental permitting activities and seamless transitions for the existing HWMA/RCRA permitted and interim status units. BNFL has obtained two HWMA/RCRA permits for the AMWTP. These include a permit for treatment and a permit for storage. When the AMWTP Facility begins operation, the only unit remaining in the INEEL M&O Storage Permit will be the WMF-628, Type II, HWMA/RCRA Storage Building. Because AMWTP facilities will be located on the INEEL, BNFL will submit their information for inclusion in the INEEL Site-Wide Title V Air Operating Permit.

BBWI performs routine environmental monitoring services for storm water pollution prevention activities associated with industrial activities and primary and secondary drinking water standards. They are responsible for these activities because the normal storm water discharge point and drinking water well will remain under their custody. BBWI conducted the site verification to determine the radiological and hazardous constituent status of property and equipment before turning over all facilities and equipment to BNFL. BNFL monitoring and sampling activities at the AMWTP focus on NESHAPS and quality sampling of drinking water. Additional information on the potable water requirements for the AMWTP can be found in MOA Section 2, Utilities.

This interface agreement is necessary to:

1. Ensure appropriate involvement by DOE-ID and BBWI permitting and operations staff
2. Provide necessary support and technical input required for modifications to existing INEEL permits
3. Provide coordinated INEEL interface with regulatory agencies and the public.

3.2 Environmental Permit-Related Responsibility Statements

BNFL will:

- Ensure consistency with existing INEEL permits and environmental authorizations.
- Provide DOE-ID and BBWI with draft copies of any permit modification requests (PMRs) for the AMWTP HWMA/RCRA Treatment Permit, the AMWTP HWMA/RCRA Storage Permit, the HWMA/RCRA Part A Permit Application for TSA Pads 1, R and 2, and the BNFL portion of the Waste Storage Facility/WMF-636 Permit to Construct and related documentation, and allow adequate time for review of the documents and written comments.
- Prepare the INEEL Title V Air Operating Permit application and draft permit, if appropriate, for the applicable BNFL-operated facilities before commencing operations in accordance with IDAPA requirements, including the WMF-636.
- Notify DOE-ID and BBWI of all Title V Air Permit noncompliances in addition to the notification provided to the State of Idaho.

DOE-ID will:

- Within 30 days of receipt, review and provide comments on the draft PMRs prepared by BNFL and/or BBWI for either the AMWTP HWMA/RCRA Treatment or Storage Permits; the

HWMA/RCRA Part A permit application for the TSA interim status units; the BNFL, TSA-RE, and AMWTF PTC; and the INEEL RWMC HWMA/RCRA Storage Permit.

- Provide quarterly updates to BNFL, including detailed information addressing how the requirements of the RWMC HWMA/RCRA Permit, Permit Condition II.K.7. (i.e., compliance with HWMA/RCRA floodplain requirements) are being met and status on the schedule for meeting this permit condition.
- Include BNFL in the review cycle for the floodplain-related documentation.
- Inform BNFL of significant proposed changes to the existing INEEL RWMC HWMA/RCRA Storage Permit that may affect AMWTP objectives and provide supporting documentation for such changes.
- Provide timely information to BNFL regarding ER activities and HWMA/RCRA corrective actions that could affect planned BNFL permits.

BBWI will:

- As requested by BNFL, provide historical documents, data, and electronic files required to prepare environmental documentation for the AMWTP.
- Notify DOE-ID and BNFL of all Title V Air Permit noncompliances in addition to the notification provided to the State of Idaho.

3.3 Environmental Monitoring and Reporting-Related Responsibility Statements

BNFL will:

- Be responsible for storm water inspections and resolution of issues that arise at the AMWTP site.
- Notify DOE-ID and BBWI when a release of a hazardous substance occurs in excess of a reportable quantity. BNFL will follow its Occurrence Reporting Procedure for notifications and reporting.
- Notify BBWI of any issues that cause or have the potential to cause environmental noncompliance, such as the RWMC Storm Water Pollution Prevention Plan, on the part of BBWI.
- Submit copies, by way of the INEEL Spill Notification Team (SNT), of all documentation to BBWI regarding spills by the AMWTP that overlap into the RWMC.
- Provide certified AMWTP emission data to BBWI no later than January 31 each year for the preceding year for inclusion in the site-wide nonradioactive air emission inventory, tri-annual air emission inventory report, and NESHAP radionuclide emission reports.
- Provide proposed modifications to the RWMC Spill Prevention Control and Countermeasures Plan (SPCC), as required, to address the addition of the AMWTP to the RWMC SPCC. BNFL will comply with the requirements presented in the revised RWMC SPCC.
- Assign an Emergency Planning and Community Right to Know (EPCRA) Coordinator/Chemical Custodian to gather and provide certified data for inclusion in the INEEL EPCRA reports. BNFL will either use the INEEL Chemical Management System (ICMS) or an independent BNFL system for tracking and accountability of all chemicals brought onto the INEEL in support of the AMWTP.
- Provide an annual certified SARA 313 report directly to DOE-ID and accurate data for inclusion in the SARA 311 and 312 reports to BBWI.

- BNFL shall provide certified Annual and Biennial hazardous waste report information to BBWI for inclusion into the INEEL Biennial and Annual report(s).
- Conduct effluent monitoring of AMWTP sources through established environmental programs.
- BNFL will conduct bacteriological sampling of the drinking water distribution system on the AMWTP site to ensure total coliform standards are being met. BNFL will notify BBWI and provide documentation of any positive samples.

DOE-ID will:

- Facilitate BNFL becoming a co-permittee with DOE-ID on the INEEL Title V Operating Permit.

BBWI will:

- Inform BNFL of releases at the RWMC that exceed a Reportable Quantity.
- Continue as currently required to monitor and sample RWMC drinking water at the source to meet drinking water standards.
- Prepare annual site-wide non-radioactive air emission inventory and NESHAP radionuclide emission reports.
- Notify BNFL of any issues that cause or have the potential to cause an environmental non-compliance on the part of the AMWTP.
- Submit copies, via the INEEL Spill Notification Team (SNT), of all documentation to BNFL regarding future spills by BBWI that overlap into the AMWTP. .
- Inform BNFL in the event of positive sample results of coliform from sampling of water at the RWMC.
- Conduct environmental surveillances outside the confines of the AMWTP area.
- Monitor drinking water for regulatory compliance.
- Be responsible for monitoring storm water discharges.

4. WASTE CHARACTERIZATION AND SERVICES

4.1 Brief Description of Interface

Waste characterization data currently resides in several historical databases, real-time radiography (RTR) tape libraries, Engineering Design Files (EDF), and numerous technical reports. The computer system utilized by BBWI for tracking and managing TRU waste is called TRIPS. This system is being transferred to BNFL as GFP.

4.2 Low-Level Waste Disposal

Low-Level radioactive waste (LLW) generated by AMWTP operations will be disposed of in the Subsurface Disposal Area (SDA) at the RWMC, or another disposal facility identified by DOE. The management of the SDA and its associated waste operations is the responsibility of BBWI. BNFL will utilize the Waste Generator Services organization of BBWI for certification and acceptance of LLW for disposal at the RWMC in accordance with the RRWAC.

4.3 AMWTP-Rejected Waste

Over the course of AMWTP Retrieval operations, it is anticipated that some waste will be recovered and identified that does not meet the AMWTP Waste Acceptance Criteria. This waste will be transferred back to the DOE/BBWI for storage and management.

4.4 Responsibility Statements

BNFL will:

- Submit written requests to DOE-ID for the required characterization data.
- Identify the technical reports and other document distribution lists for BNFL inclusion.
- Ensure that wastes sent to BBWI for dispositioning meet the applicable sections of the RRWAC.
- Report data to support the annual *Site Treatment Plan* and quarterly Idaho Department of Environmental Quality meetings.
- Upon request, provide annual updates on projection of the estimated amount of LLW that will require disposal in the SDA.
- Provide waste stream data to DOE-ID to support National TRU Program and IPABS needs.

DOE-ID will:

- Respond in a timely manner to BNFL requests for characterization data.
- Maintain the SDA available for LLW disposal operations or provide for LLW disposal capability at another DOE Site location.

BBWI will:

- Assist BNFL in identifying characterization data and documents of interest and respond in a timely manner to DOE-ID's data and document requests. Where possible, the characterization data will be transmitted in electronic form.
- Following approval by the export control representative, add BNFL to the distribution list for modifications and updates to identified technical reports and other characterization documents.
- On the schedule required by the State of Idaho Department of Environmental Quality, provide copies of each report and supporting documentation required to meet RWMC HWMA Storage Permit conditions: II.K.1, II.K.2, II.K.4, and II.K.5.
- Provide BNFL access to the Integrated Waste Tracking System (IWTS) for integration of AMWTP waste generation activities with the INEEL.

5. EMERGENCY RESPONSE AND PREPAREDNESS

5.1 Brief Description of Interface

The emergency response and preparedness interfaces established between BBWI and BNFL are a critical component in protecting workers, the environment, equipment, and property. The services included in this AMWTP MOA are (1) INEEL Fire Department emergency services – fire suppression, emergency medical response, hazardous materials emergency response, confined space rescue, and search and rescue, (2) life safety systems, (3) decontamination, (4) emergency notification and reporting systems, and (5) mutual aid agreements with local emergency response and care providers. BBWI currently provides these services to the RWMC. In accordance with the AMWTP contract, the availability and use of these emergency response services is mandatory. BBWI shall provide response capabilities 24 hours a day from the fire department that meet applicable OSHA, NFPA, and DOE requirements.

5.1.1 Overall Responsibility for an Emergency

BNFL is responsible for all emergencies within the AMWTP boundaries, regardless of the services provided by the INEEL Fire Department discussed in this section. BBWI is responsible for emergencies at the RWMC not within the established AMWTP boundaries. For AMWTP-declared emergency events, the INEEL CFA Emergency Control Center (ECC), INEEL Emergency Operations Center (EOC), and INEEL Joint Information Center (JIC) will be activated. The AMWTP Emergency Coordinator/designee will coordinate with the CFA ECC for emergency logistical support. The INEEL EOC will provide assistance in consequence assessment, public information, and press releases. BNFL will ensure that BBWI has all source term data and other relevant information needed to assist with consequence assessment. The JIC will facilitate dissemination of press releases. For emergencies that cross the AMWTP boundaries, each party will respond appropriately to protect their personnel and property; however, the point at which the emergency originated will determine the organization with the lead responsibility for responding to the emergency.

BNFL is responsible for managing AMWTP emergencies within AMWTP as an independent facility. Both the RWMC and the AMWTP will have assigned emergency coordinators. During joint emergencies both the RWMC and AMWTP will provide an emergency coordinator to assist in a coordinated emergency response. During emergencies that cross facility boundaries, emergency response coordination will take place at the RWMC Command Post, currently located in WMF-637 (Operations Control Building). If the emergency only affects one party, the responsible emergency coordinator will keep the other party informed of the status of the emergency. During emergencies, field data gathered will be shared with the emergency coordinators in a timely manner.

If either the AMWTP or RWMC activates a command post for an emergency condition, the other party will be notified. The AMWTP command post is located in WMF-637. During operations, command post capabilities will be developed in WMF-676 (AMWTP Treatment Facility).

5.1.2 AMWTP/RWMC Emergencies

If any RWMC personnel detect a potential emergency within the AMWTP boundary they will notify the WCC and the INEEL Fire Department. If any AMWTP personnel detect a potential emergency within the RWMC boundary, they will notify the WCC and the INEEL Fire Department.

5.1.3 Emergency Drills

BNFL's AMWTP will participate with RWMC in at least one drill or evaluated exercise annually. Coordination between the AMWTP Operations Manager/designee, DOE-ID, and BBWI will take place for all emergency drills/exercises that may affect the AMWTP and the RWMC.

If either BBWI or AMWTP plan to have an evacuation drill, they will give advance notice to the other party. Every effort will be made to provide notification at least 30 calendar days in advance of a drill.

5.1.4 Event Classification and Notifications

Both the AMWTP and RWMC will be responsible for their own occurrence reporting. AMWTP emergency event classification and notifications will be the responsibility of BNFL. The RWMC on-duty emergency coordinator will be informed of emergency events arising from AMWTP operations. Further notifications to onsite and offsite agencies regarding AMWTP activities will be coordinated between BNFL, DOE-ID, and the INEEL Warning Communication Center (WCC).

BNFL personnel will develop, coordinate, and issue press releases regarding incidents and emergencies involving the AMWTP. Coordination will occur with DOE-ID Communications and INEEL Public Affairs before distribution of press releases.

5.1.5 Response to Emergency Alarms

When global (involving both RWMC and AMWTP facilities) Emergency Notification System (ENS) alarms are activated during an actual emergency, AMWTP personnel will respond in accordance with the AMWTP Emergency Plan and BBWI personnel will respond in accordance to the RWMC Emergency Plan. Training on response to global ENS alarms will be included in the applicable AMWTP and RWMC ES&H training.

Both AMWTP and RWMC have the capability to initiate global ENS alarms. Currently AMWTP personnel have the capability to initiate RWMC ENS alarms from WMF-610. RWMC personnel have the capability to initiate ENS alarms in WMF-601, WMF-620 and WMF-637 for the building just transferred to BNFL responsibility. Reconfiguration of both the AMWTP and RWMC ENS systems are planned to separate the into two independent systems except at a single well defined interface or demarcation point which will provide joint access to both systems for global ENS alarms and notifications. (Ref: ENS in Section 8.3.2)

Any periodic testing of either RWMC or AMWTP ENS alarms will require notifications of both the RWMC Shift Supervisor and the AMWTP Facility Fire Protective Engineer. System performance reports for alarm testing within the AMWTP boundary will be coordinated through the AMWTP Facility Fire Protective Engineer.

5.1.6 AMWTP Evacuation Procedures

During an evacuation of the RWMC or AMWTP, AMWTP personnel will use busses provided by BBWI during the normal working hours of Monday through Thursday, 0700–1730. At other times, AMWTP will use privately owned vehicles to evacuate the site. AMWTP's primary evacuation route is Adams Blvd, unless otherwise directed. T-12 is the secondary route. Farragut Blvd. should be used only if directed by the CFA emergency action manager. AMWTP personnel will proceed to the location

specified by the CFA emergency action manager. AMWTP passes will provide access to INEEL evacuation relocation areas.

5.1.7 Accountability during RWMC or AMWTP Emergencies

During emergencies, both AMWTP and RWMC will have a system to account for all personnel. Those systems will also account for visitors. The two emergency coordinators will exchange accountability information.

5.1.8 Emergency Response and Preparedness Training

The AMWTP will have a trained Emergency Response Organization to respond to emergencies within the AMWTP boundaries. RWMC personnel will not respond to any emergencies within the AMWTP boundaries, including WMF-613.

5.1.9 INEEL Fire Department/Fire Fighter Support

During AMWTP operations, the INEEL Fire Department will provide emergency response (personnel and equipment) to requests for assistance 24 hours a day, every day of the year. Emergency services include all types of fire fighting services (structural, vehicle, wild land, etc.) emergency medical services, hazardous material release mitigation, and technical rescue (including confined space). During emergency responses, the INEEL Fire Department provides the On-Scene Incident Commander, who has charge of the scene.

The INEEL Fire Department maintains critical minimum staffing, providing four engine companies, including two engine companies located at the CFA. The CFA companies will provide primary response to AMWTP emergencies. Each engine company has five personnel who are trained in emergency response. The best response time for the INEEL Fire Department to arrive at the RWMC is ten minutes; this time depends on several factors, including concurrent INEEL emergencies and weather. Historically, there are, on average, 17 times during the year that the INEEL fire department has multiple emergency events and is unable to respond immediately to emergency service calls. BNFL will take this under consideration in developing their applicable plans and procedures.

The INEEL Fire Department will provide emergency response services only; cleanup is the responsibility of BNFL. Should the INEEL Fire Department be requested to respond to an emergency within the AMWTP boundary, the BNFL emergency coordinator will ensure that a designated representative meets and works with the responding engine company.

BNFL will schedule preplanning meetings with the INEEL Fire Department. These meetings will provide input to the INEEL Fire Department's preincident plan for the AMWTP, including gate response strategies. The preincident plan will be a joint effort between the INEEL Fire Department and AMWTP personnel, and will incorporate relevant changes in facility condition, design and hazards.

INEEL Fire Department walk downs of the AMWTP site will be coordinated with BNFL's emergency planner to ensure that visits are conducted at times when impact to AMWTP activities is minimal.

5.1.10 Emergency Medical Services (Emergency Response: Ambulance and Emergency Medical Technicians)

BBWI emergency medical services are provided to AMWTP employees and visitors. These include ambulance, EMT, and RN/EMT capabilities, and decontamination/medical facilities as deemed appropriate by the responding ambulance personnel, following Occupational Medicine's protocols/

procedures (P&Ps). The response(s) will be coordinated by the CFA Clinic using the P&Ps. Ability-to-work and physical examinations will not be provided to AMWTP personnel.

5.1.11 Local Mutual Aid Agreements

DOE-ID has included BNFL in all mutual-aid agreements with local police departments, fire departments, hospitals, and emergency response teams from the surrounding municipalities and counties, including Bonneville, Butte, Clark, Jefferson, and Bingham. These facilities can be used to treat AMWTP workers injured during emergencies.

5.1.12 INEEL HAZMAT Team

The INEEL Fire Department, which also functions as the INEEL HAZMAT team, will mitigate the spread of spills involving hazardous materials at the AMWTP facility. INEEL Fire Department personnel are trained and certified for HAZMAT response. Should AMWTP personnel need to summon the INEEL HAZMAT team, the call will be directed to the INEEL Fire Department Dispatch Center or the INEEL Warning Communications Center (WCC). Cleanup of the spill and decontamination of equipment will be performed by BNFL.

BNFL will have an environmental specialist on call. BNFL will be responsible for determining if a spill is reportable and will follow the AMWTP Occurrence Reporting Procedure in these situations.

5.2 Responsibility Statements

BNFL will:

- Manage all emergencies within AMWTP boundaries in accordance with the AMWTP Emergency Plan/RCRA Contingency Plan.
- During operations, provide a BNFL interface with the INEEL fire Department upon the fire department's arrival at the AMWTP.
- Activate the AMWTP Emergency Response Organization for emergency events.
- Provide the INEEL WCC with the AMWTP's Duty Officer (emergency coordinator on call) List.
- Complete emergency event notifications for AMWTP emergency events.
- Complete emergency event categorization and classification for AMWTP emergency events.
- Notify RWMC of protective actions that affect RWMC personnel/facilities.
- Provide the INEEL Security organization access to the AMWTP site.
- Participate with the RWMC in at least one drill or exercise annually.
- Coordinate with BBWI for any planned drills that may impact BBWI and provide 7 days notification for drills and 30 days for drills involving evacuation exercises.
- Notify the RWMC of AMWTP incidents that require INEEL Fire Department response.
- Provide any additional alarm hookups within the AMWTP boundaries, in addition to the current hookups in government-furnished facilities.
- Provide input to alarm system performance reports to BBWI.
- The AMWTP emergency coordinator will coordinate with the RWMC emergency coordinator to determine the best way to implement protective actions that affect the entire RWMC/AMWTP area.

- Jointly develop preincident plans for AMWTP emergencies with the INEEL Fire Department. These plans should incorporate relevant changes in facility condition, design and hazards
- Conduct occurrence and other required reporting for the AMWTP.
- Accompany the INEEL Fire Department personnel on AMWTP site walk-downs.
- During the INEEL Fire Department walk-downs of the AMWTP site, provide BBWI with the information necessary for BBWI to meet the requirements of DOE Order 151.1, Comprehensive Emergency Management System.
- As necessary, BNFL will provide an updated forecast of the number of AMWTP personnel located at the AMWTP site to BBWI's RWMC Emergency Planner.
- Provide the Warning Communications Technical Leader with the AMWTP ERO duty list.

DOE-ID will:

- Include AMWTP in all INEEL mutual-aid agreements.
- Ensure the INEEL EOC is activated for AMWTP emergency events and supports ongoing consequence assessment (plume modeling, dose assessment, and site monitoring), and public information/press releases development.
- Ensure the Public Information Center is activated for AMWTP emergency events to support public information/press releases.

BBWI will:

- Manage all emergencies at the RWMC and outside the AMWTP boundaries.
- Provide emergency response services to BNFL's AMWTP site as previously specified.
- Maintain the INEEL Fire Department capability to respond to emergencies.
- Provide AMWTP a single point of contact for emergency notifications.
- Notify the AMWTP of any planned drills that impact the AMWTP at least one week in advance.
- Notify the AMWTP of RWMC incidents that require INEEL Fire Department response.
- Coordinate alarm system performance reports with the BNFL Facility Fire Safety Engineer.
- During an evacuation of the RWMC or AMWTP, provide evacuation buses to the AMWTP site during normal work hours of Monday through Thursday, 0700-1730.
- Ensure (through Fleet Operations) an appropriate number of buses are identified for evacuation at the AMWTP site.
- Provide AMWTP personnel access to CFA during emergencies.
- Incorporate the AMWTP emergency notification list in WCC.
- Provide INEEL Fire Department walk-downs of the AMWTP site and coordinate these walk-downs with the BNFL Emergency Planner to minimize the impact on AMWTP activities.

6. HEALTH AND SAFETY

6.1 Brief Description of the Interface

The DOE-ID, BBWI, and BNFL share common values on the importance of employee health and safety. Although the AMWTP regulatory environment is not identical to RWMC's, they both emphasize health and safety. The guiding principle for both is application of the Integrated Safety Management (ISM) methodology. The objective of ISM is to systematically integrate safety into management and work practices at all levels, so that missions are accomplished while protecting the public, workers, and the environment. This objective is accomplished by defining specific work scope, analyzing the hazards, developing and implementing hazard controls, performing effective and efficient work planning, performing safe and efficient work, and feeding the results of work performed back into the work control process. With consistent application of ISM principles, BBWI and BNFL will conduct construction and operations activities safely and effectively.

DOE-ID's approval of safety documentation, programs, and methods to be used by all INEEL contractors will ensure that the approach implemented by BBWI and the AMWTP will promote a safe working environment for all INEEL employees. DOE-ID's approval of the AMWTP safety program ensures that the current level of safety provided to workers at the RWMC is not diminished by AMWTP project activities. Conversely, DOE-ID's approval of BBWI safety program ensures the safety of personnel constructing and operating the AMWTP.

For information purposes, BBWI will be provided copies of the AMWTP Environmental, Safety, and Health Program Operating Plan (ESHPOP). To promote safety during operations, the following activities will be supported by BBWI and BNFL:

- Relevant safety information will be shared between BBWI representatives and the BNFL ES&H Manager, as necessary.
- Advance notice of activities that could impact each other will be shared among all parties.
- Honest and open communications channels will be a priority when handling safety issues.

6.2 Safety Training

The AMWTP and RWMC will have independent site access training requirements. The AMWTP's site access plan will be included as part of the AMWTP Environmental, Safety, and Health Program Operating Plan, as well as applicable AMWTP operating procedures. For unescorted access to the AMWTP site, all individuals must take the appropriate AMWTP training and be approved by BNFL management. For routine maintenance operations performed within the AMWTP boundary by BBWI, workers must meet applicable standard OSHA and safety training requirements for the specific maintenance activity to be performed within the AMWTP boundary. Access requirements are also addressed in Section 7, Safeguards and Security of this MOA.

Unescorted access to the RWMC requires all applicable M&O access training.

6.3 Areas of Special Concern

6.3.1 Stop Work Authority

The AMWTP contract defines and describes DOE-ID's "stop work authority" over BNFL's AMWTP work. The only DOE-ID individuals authorized to stop BNFL's AMWTP work under any

circumstances, including environmental, safety and health issues, are the DOE-ID contracting officer or an authorized DOE-ID designee.

Both BBWI and BNFL can express their safety concerns at any time and can notify the appropriate line management if an unsafe act is observed at any location. If the unsafe act is reported, specific information about the act will be provided to the appropriate line manager (i.e.; the RWMC shift supervisor, AMWTP ES&H Manager, and DOE-ID Waste Management Operations Division Deputy Director).

If there is an *imminent threat to life* observed by anyone, all personnel have an obligation to provide an immediate verbal warning to the individual(s) endangered, followed by a report of the event to the appropriate line manager.

6.3.2 Lockout/Tagout Procedures

BBWI and AMWTP will recognize all of the procedures for lockout/tagout implemented by the other party. They both shall use lockout/tagout procedures compliant with OSHA requirements. To be consistent with BBWI procedures, the AMWTP will require use of the color red for locks.

6.3.3 Radiation Protection Program

BNFL will be responsible for compliance with the AMWTP Radiological Protection Program within the AMWTP areas. BBWI will be responsible for compliance with the RWMC Radiological Protection Program within the RWMC areas.

6.4 Responsibility Statements

BNFL will:

- Provide BBWI a copy of the AMWTP ESHPOP.
- Not have stop work authority over BBWI activities other than work performed by AMWTP employees for the RWMC.
- Recognize BBWI's lockout/tagout procedures.
- Use the color red for locks used for tagout/lockout.
- Be responsible for compliance with the AMWTP Radiological Protection Program within the AMWTP areas.

DOE-ID will:

- Have stop work authority in accordance with the AMWTP and INEEL M&O contracts.
- Approve BNFL and BBWI safety documentation.

BBWI will:

- Not have stop work authority over BNFL's AMWTP activities other than work performed by INEEL M&O employees for the AMWTP.
- Be responsible for compliance with the RWMC Radiological Protection Program within the RWMC areas.

7. SAFEGUARDS AND SECURITY

7.1 Brief Description of Interface

The safeguards and security interfaces established between BBWI and the AMWTP are an integral part of maintaining a secure environment at the RWMC and establishing effective communication channels between the AMWTP and RWMC security personnel. BNFL is responsible for security within the AMWTP boundaries. The INEEL Safeguards and Security Department will have keys to the locks on all AMWTP gates. Therefore, in the event of an emergency, either party can open any gate.

BBWI access to WMF-628 and the ILTSF does not require AMWTP site access training. AMWTP employees traveling to WMF-613, WMF-658 DOE offices and WMF-620 shift desk directly from the TSA do not require RWMC site access training.

Primary access to AMWTP facilities will remain by way of the southern TSA gate. The AMWTP site consists of everything within the TSA (except WMF-628 and the ILTSF) and WMF-613 within the RWMC Administrative Area. The AMWTP boundaries are defined by the TSA chain-link fence to the north, east, and south, with the exception of WMF-628, which will remain in BBWI's control. The AMWTP boundary to the west is a north/south line adjacent and parallel to the west edge of the blacktop road west of WMF-636, and east of the ILTSF. The skin of WMF-613 is the boundary of the AMWTP's office building located in the RWMC Administrative Area. BNFL will be allowed access to the exterior of WMF-613 for maintenance purposes. The skin of WMF-628 is the boundary of BBWI's Type II storage building located in the TSA. BBWI will be allowed access to the exterior of WMF-628 for inspections, maintenance, and security purposes.

AMWTP personnel access to WMF-613 shall be through the south entrance of the TSA, then using the bridge on the north side of the TSA into and from the RWMC. AMWTP personnel may proceed to and from WMF-613, the DOE-ID offices in WMF 658, or the RWMC shift supervisor's desk in WMF 620. Access will be limited to foot traffic or Cushman-type carts. For security purposes, routine AMWTP vehicle traffic into the RWMC shall process through the main RWMC entrance at WMF-637 and comply with all RWMC requirements (private vehicles are not allowed). On occasion, it will be necessary for vehicles to enter the RWMC using the bridge across the drainage canal between the RWMC and AMWTP. On these occasions, permission must be received from the RWMC Shift Supervisor, and an INEEL security officer will be dispatched to conduct the required vehicle inspection at the bridge. In order to maintain proper accountability, AMWTP personnel shall be trained to know that if they enter through the AMWTP south gate, they must exit through that gate.

BBWI personnel and equipment will be allowed entry into the AMWTP through the north TSA gate (south RWMC gate) and the use of AMWTP roadways to access WMF-628 and the ILTSF to conduct operations in those facilities. BBWI personnel who enter through WMF-637 must also exit through WMF-637. If they enter the AMWTP through the AMWTP south gate, they must exit through the AMWTP south gate. BBWI personnel access into the TSA by way of the gate at the RWMC TSA bridge will be controlled by the appropriate BBWI work control processes. Access into the TSA will only be for authorized work necessary for accomplishing contract responsibilities, mainly with respect to WMF-628, the ILTSF, and maintenance of systems remaining under INEEL contractor control. Likewise, AMWTP personnel access into the RWMC by way of the TSA bridge will be controlled by the appropriate AMWTP work control processes and will be only for performance of authorized work, mainly with respect to the receipt and shipment of waste transport vehicles, and access to the BNFL offices located in the RWMC Administrative area (WMF-613) and the DOE-ID offices located in WMF-658.